

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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Mark Saunders, )  
Plaintiff, )  
v. )  
Empire Today LLC, )  
Empire Home Services, LLC, et al )  
COBRASOURCE, Inc. )  
Defendant. )  
\_\_\_\_\_  
)

Civil Action No. 10-11484-GAO

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**PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT  
EMPIRE'S MOTION TO DISMISS**

COMES NOW the Plaintiff, appearing pro se, moves for an extension of time to respond to Defendants' Motion to Dismiss for the following reasons:

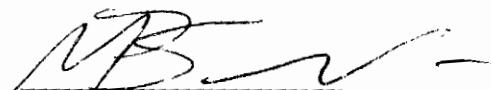
1. Plaintiff is disabled (Massachusetts Disabled Persons Parking Identification Placard P06663470) and currently under extreme physical duress. He is being treated at the St. Elizabeth Hospital Department of Anesthesiology and Pain Medicine, Pain Management Center and in addition by Dr. Stephen Gutting of the St. Elizabeth Hospital Department of Neurosurgery. Both are located at St. Elizabeth's Medical Center, 736 Cambridge Street, Boston, Massachusetts 02135.
2. Plaintiff received a radiosscopic epidural spinal injection performed by Dr. Frederic Gerges on March 3<sup>rd</sup>, 2011 and is currently recovering. This procedure was complicated by the treating physician's inability to access the primary injection site due to severe

vertebral compaction. This complication limits the ability of the medication to treat the primary site of Plaintiff's injury.

3. As a pro se Complainant, Plaintiff is severely restricted by the inability to easily access and review legal information. Any access to the law library at the John Joseph Moakley U.S. Courthouse is beyond Plaintiff's current ambulation ability. (Plaintiff has not as yet even been granted permission to access this facility.) As Plaintiff is not a member of the Bar and is not a law school student, he is denied access to libraries at local schools of law.
4. Plaintiff also has no access to the electronic filing system (CM/ECF) and must rely on travel and ambulation to file legal documentation. This is extremely difficult at the current time, as bed rest is as much as 20 hours per day with very little ambulation. This bed rest also severely limits Plaintiff's ability to prepare legal documentation.
5. Plaintiff continues to seek counsel in this highly specialized area of law. This has proven difficult due to cost (Plaintiff has been granted permission to proceed in forma pauperis.) and by the limited number of area attorneys practicing in this field of law. Plaintiff remains determined in his efforts to retain counsel to adequately litigate this matter.
6. Plaintiff attempted to contact attorney Matthew Caccamo of the firm of Wildman, Harrold, Allen & Dixon and did contact local attorney William Hunt of the firm of Clark, Hunt, Ahern & Embry. Attorney Hunt was attempting to contact attorney Caccamo to seek Defendant's consent to the extension at the time of this filing.

WHEREFORE, Plaintiff prays that this Court enter an Order extending Plaintiff's time to respond to Defendant's Motion to Dismiss to April 15, 2011.

Respectfully submitted,



Mark P. Saunders  
28 Cushman Street  
Watertown, Massachusetts 02472-3704  
617-905-7454

Dated: 4 March 2011

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of March, 2011, copies of the foregoing PLAINTIFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT EMPIRE'S MOTION TO DISMISS were deposited in the United States Mail, postage prepaid, addressed to the following:

Matthew Caccamo  
Wildman, Harold, Allen & Dixon LLP  
225 W. Wacker Drive, Suite 2800  
Chicago, IL 60606

David A. Anderson  
One New Hampshire Avenue  
Third Floor, Suite 350  
Portsmouth, NH 03801

Michael J. Rossi  
William J. Hunt  
55 Cambridge Parkway  
Cambridge, MA 02142

Debrai G. Haile  
Laner, Muchin, Dombrow, Becker, Levin and Tominberg, Ltd.  
515 N. State Street, Suite 2800  
Chicago, IL 60654

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